



ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

DATA PROTECTION POLICY

1. Introduction

Action for Change & Empowerment (A.C.E.) is committed to protecting the privacy and security of personal data. This policy outlines our approach to handling personal data in compliance with data protection laws, including the relevant UK Data Protection Act and the General Data Protection Regulation (GDPR). We recognize the importance of safeguarding the personal data we collect and process, ensuring it is handled responsibly and securely.

2. Purpose

The purpose of this policy is to:

- Ensure that Action for Change & Empowerment complies with applicable data protection laws and best practices.
- Protect the rights of individuals whose personal data we hold.
- Set clear guidelines for the collection, storage, use, and sharing of personal data within the organization.
- Promote transparency in how we manage personal data.

3. Scope

This policy applies to all employees, volunteers, trustees, and contractors who handle personal data on behalf of Action for Change & Empowerment (A.C.E). It covers all personal data, whether it is collected electronically, on paper, or through any other means.

4. Definitions

- **Personal Data:** Any information relating to an identified or identifiable living individual, such as names, contact details, identification numbers, etc.
- **Sensitive Data:** Personal data that is more sensitive in nature, such as health information, racial or ethnic origin, political opinions, etc.
- **Data Subject:** An individual whose personal data is being processed.
- **Data Processing:** Any operation performed on personal data, including collection, storage, retrieval, use, and sharing.

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Action for Change & Empowerment (A.C.E)
10, Balfe Street, London, N1 9EG
Company Limited by Guarantee.
Registered in England & Wales.
Company number 07708601



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5. Legal Basis for Processing Personal Data

Action for Change & Empowerment (A.C.E) will only collect and process personal data when:

- We have a lawful basis for doing so, such as the individual's consent, contractual necessity, or legal obligation.
- The processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject before entering into a contract.
- The processing is necessary for compliance with a legal obligation to which we are subject.
- The processing is necessary for the legitimate interests pursued by Action for Change & Empowerment or a third party, provided that the data subject's rights and interests are not overridden.

6. Data Collection

When collecting personal data, we will:

- Clearly explain why we are collecting the data, how it will be used, and who it will be shared with (if applicable).
- Only collect data that is necessary for the purpose it is being collected.
- Ensure that the data is accurate, complete, and up-to-date.
- Obtain the data directly from the data subject wherever possible.

7. Data Storage and Security

We will take appropriate technical and organizational measures to ensure the security of personal data, including:

- Storing personal data in secure systems with appropriate access controls.
- Encrypting sensitive data where appropriate.
- Restricting access to personal data to only those employees or volunteers who need it to perform their duties.
- Implementing physical security measures to protect personal data stored on paper or physical devices.
- Regularly reviewing and updating security practices to address emerging risks.

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8. Data Retention

We will not retain personal data longer than necessary for the purposes for which it was collected. Personal data will be retained for the following periods:

- **Client and Donor Records:** Retained for as long as required for legal, financial, and regulatory purposes.
- **Employee and Volunteer Records:** Retained according to legal and organizational requirements.
- **Event Participants:** Data will be retained for a reasonable period following the event, typically no longer than 6 months.
- Once the data is no longer required, it will be securely destroyed or anonymized.

9. Rights of Data Subjects

Individuals whose personal data we process have the following rights:

- **Right to Access:** The right to request copies of the personal data we hold about them.
- **Right to Rectification:** The right to request correction of any inaccurate or incomplete data.
- **Right to Erasure:** The right to request that personal data be deleted, subject to certain conditions.
- **Right to Restriction of Processing:** The right to request the restriction of processing of their data under certain circumstances.
- **Right to Data Portability:** The right to request their personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** The right to object to the processing of their personal data for certain purposes, including direct marketing.
- **Right to Withdraw Consent:** If the processing is based on consent, individuals can withdraw their consent at any time.
- To exercise any of these rights, data subjects may contact contactus@aforce.org.

10. Sharing of Personal Data

We may share personal data with third parties in the following circumstances:

- To comply with legal or regulatory obligations.
- To external service providers (e.g., cloud storage providers) who process data on our behalf.
- To partners or collaborators, where necessary for the delivery of services or projects, with appropriate data protection safeguards in place.

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- For fundraising purposes, with explicit consent from the data subject.
- We will ensure that any third parties receiving personal data are subject to contracts and safeguards to protect the data in accordance with this policy.

11. Data Breach Protocol

In the event of a data breach, we will:

- Assess the severity and impact of the breach.
- Notify the affected individuals if the breach is likely to result in a high risk to their rights and freedoms.
- Notify the Information Commissioner's Office (ICO) within 72 hours if the breach is likely to result in a high risk to individuals' rights and freedoms.
- Take steps to mitigate the impact of the breach and prevent future occurrences.

12. Training and Awareness

All employees, volunteers, and trustees of Action for Change & Empowerment will receive regular training on data protection and this policy to ensure they understand their responsibilities in protecting personal data.

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ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

Policy Owner: Board of Trustees / Directors

Policy Lead: Director / Senior Responsible Owner (SRO)

Audience: Employees, Volunteers, Trustees, and Contractors

Formally Endorsed By: Board of Trustees / Directors / Coordinating Committee

Last Reviewed: 01/09/2025

Next Review: 31/08/2026

Bola Obanubi

Director, A.C.E NGO

Action for Change & Empowerment (A.C.E NGO)

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